



PROCHIMICA NOVARESE S.p.A.

SUPPLIER SUSTAINABILITY CODE OF CONDUCT

[1. Purpose and Scope]

This Supplier Sustainability Code of Conduct defines the minimum requirements that suppliers of Prochimica Novarese S.p.A. must comply with in order to establish and maintain business relationships with the company.

It applies to all suppliers of goods and services and, where possible, to their subcontractors involved in the supply of products and services to Prochimica Novarese.

[2. Compliance with Laws and Reference Standards]

Suppliers must:

- Comply with all applicable laws and regulations in the countries in which they operate, including rules on occupational health and safety, environment, human rights, data protection, product safety and the transport of dangerous goods.
- Comply with relevant commitments arising from standards applicable to the supply chain (e.g. RSPO for relevant raw materials) and, where appropriate, adopt recognised environmental or social management systems.

[3. Environmental Requirements]

Suppliers must commit to:

- Managing their environmental impacts responsibly, through the control of emissions, waste, and the consumption of natural resources and energy.
- Fully complying with applicable environmental legislation and with the conditions of any permits required.
- Adopting measures to prevent pollution and, where possible, to reduce the hazardousness of the chemicals used.
- Ensuring the availability and updating of Safety Data Sheets (SDS) and of declarations of compliance with applicable regulations (e.g. REACH) for the products supplied.
- Cooperating with Prochimica Novarese in providing information on their environmental performance (e.g. certifications, audits, questionnaires).

[4. Social Requirements and Human Rights]

Suppliers must:

- Prohibit any form of child labour, forced labour or labour resulting from human trafficking.
- Ensure safe and healthy working conditions, providing adequate training, PPE and accident prevention measures.
- Respect working hours, rest periods and holidays as required by applicable laws and contracts.



- Pay at least the minimum contractual wages and, where applicable, comply with rules on overtime and related premiums.
- Prevent any form of discrimination and harassment based on gender, age, nationality, religion, sexual orientation, political opinions or other personal characteristics.
- Respect freedom of association and the right to collective bargaining, within the limits of local laws.

[5. Business Integrity and Ethics]

Suppliers must:

- Refrain from any form of corruption, extortion, fraud, money laundering or other illegal practices.
- Not offer or promise to employees or representatives of Prochimica Novarese any money, gifts, hospitality or other benefits that could improperly influence business decisions.
- Properly manage potential conflicts of interest, informing Prochimica Novarese of any situations in which personal or family interests may interfere with the activities carried out.
- Protect the confidentiality of information received and of personal data processed in the context of the business relationship.

[6. Contractual Clauses, Monitoring and Consequences]

Prochimica Novarese reserves the right to:

- Include in contracts with suppliers specific social, environmental and ethical clauses that refer to this Code of Conduct.
- Require suppliers to sign the Code of Conduct as a condition for starting or continuing the relationship.
- Carry out, directly or through third parties, compliance checks (e.g. questionnaires, document requests, possible on-site visits to critical suppliers).

In the event of serious or repeated violations of this Code, Prochimica Novarese may require the implementation of corrective actions within defined timeframes and, in the absence of adequate improvements, may suspend or terminate the contractual relationship.

[7. Acceptance]

The supplier acknowledges the contents of this Supplier Sustainability Code of Conduct and undertakes to comply with them and to promote them along its own supply chain, to the extent reasonably possible.

San Pietro Mosezzo, 15 January 2026

Revision 02

Top Management

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